

**REMARKS**

Applicants have carefully reviewed this Application in light of the Office Action mailed May 23, 2001. Claims 1-63 were pending at the time of Office Action. Claims 1-33, 35, 35, 38-40, 42-47, 50 and 58-63 stand rejected. Claims 34, 36, 37, 41, 48, 49, and 51-57 have been objected to by the Examiner. Applicants respectfully request reconsideration and favorable action in this case.

**Allowable Claims**

Applicants thank the Examiner for the allowance of Claims 34, 36, 37, 41 and 48-49 and 51-56 if rewritten in independent form. Applicants respectfully request to defer rewriting these claims into independent form until the remarks in this Response are addressed by the Examiner.

**Rejections Under 35 USC § 102**

The Examiner rejected Claims 1, 2, 4-8, 11-12, 16, 18-20, 23, 30-31 as being unpatentable over Knudson et al, U. S. Patent No. 5,765,140 ("Knudson"). Of these, Claim 1 is independent. Applicants respectfully traverse this rejection for at least the following reasons. To anticipate a claim, the reference must teach every element of the claim. Manual of Patent Examining Procedure (MPEP) § 2131.

Knudson discloses a dynamic project management system that includes a server network and a master database. The network may be configured for translating a project plan including a plurality of tasks to be performed by users of the network into the master database to affect an assignments table. Knudson, Abstract. The assignments table includes a list of project tasks assigned for completion by each of the users. Knudson, Abstract. Knudson further discusses that project managers may periodically track and control project progress in accordance with "the previously defined time schedules." Knudson, col. 7, lines 40 – 46. This project progress is tracked by using a list of project tasks assigned for completion in an assignments table in the master database. Knudson, col. 6, lines 4 – 11. The assignments table lists "assigned tasks for one or more projects for each of the identified users". Knudson, col. 6, lines 12 – 14. Knudson further describes the assignments table as being used "for assigning project tasks to users identified by their user profiles, which may be updated to

"adjust assigned tasks and time schedules as required for the various identified users". Knudson, col. 6, lines 31 – 32; col. 7, lines 40 – 47.

Claim 1 recites, in part, "a tactic table operable to store at least one predefined tactic supported by the program office database and a tactic type for each tactic", and "a tactic type to progress milestone category cross-reference table operable to map at least one progress milestone category to the at least one tactic type". The cited portion of Knudson generally involves a master database, project tasks, a project plan and users. See Knudson, col. 11, lines 38-40; col. 12. The cited portion of Knudson does not involve a "tactic" or a "tactic type" of any kind, nor has the Examiner provided any explanation of how Knudson teaches or suggests these elements of Claim 1. Indeed, the Examiner's rejection of Claim 1 simply involves quoting language from Claim 1 and citing to portions of Knudson without providing any reasoning or analysis as to how the cited portions of Knudson relate to the elements of Claim 1.

Therefore, Knudson does not teach or suggest every limitation of Claim 1. For at least these reasons, Claim 1 is allowable over the cited reference of Knudson and Applicants respectfully request allowance of Claim 1.

Dependent Claims 2, 4-8, 11-12, 16, 18-20, 23, 30-31, which depend from independent Claim 1, are patentable over Knudson for the same reasons as discussed above with respect to Claim 1 and as defining further limitations over the cited reference.

### **Rejections Under 35 USC § 103**

The Examiner rejected Claims 27, 32, 35, 38-40, 42, 44, 45-47, 50, 57, 60-62 as being unpatentable over Knudson et al., U. S. Patent No. 5,765,140 ("Knudson") view of PMBK. Of these, Claim 32 is independent. Applicants respectfully traverse this rejection for at least the following reasons.

Claim 32 recites, in part, "storing and accessing a tactic table having at least one predefined tactic supported by the program office database" and "storing and accessing a tactic type table having at least one valid tactic type". As shown above, Knudson does not teach or suggest these elements and PMBK is not relied upon by the Examiner to teach these elements, nor does PMBK teach or suggest these elements. Therefore, for at least these reasons, Claim 32 is allowable over Knudson and PMBK. Thus, Applicants respectfully request allowance of independent Claim 32.

The Examiner rejected Claim 63 as being unpatentable over Knudson et al, U. S. Patent No. 5,765,140 ("Knudson"). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 63 recites, in part, "a tactic table operable to store at least one predefined tactic supported by the program office database and a tactic type for each tactic" and "a tactic type to progress milestone category cross-reference table operable to map at least one progress milestone category to the at least one tactic type". As shown above, Knudson does not teach or suggest these elements of Claim 63. Therefore, for at least these reasons, Claim 63 is allowable over Knudson. Thus, Applicants respectfully request allowance of independent Claim 63.

Dependent Claim 3 stands rejected as being unpatentable over Knudson as applied to Claim 1 above, and further in view of Gary Hamel et al., *THE E-CORPORATION: More than just Web-based, it's building a new industrial order*. ("Gary Hamel"). Applicants respectfully traverse this rejection and submit that dependent Claim 3 is allowable as depending from independent Claim 1, shown above to be allowable, and as defining further limitations over the cited references of Knudson and Gary Hamel. Gary Hamel discusses the author's views of expectations that will "reverberate throughout the economy, affecting every business in eight major ways." Gary Hamel, p. 82. The portions cited by the Examiner discuss merely that "a real E-corp isn't just using the Internet to alter its approach to markets and customers; it's combining computers, the Web, and the massively complex programs known as enterprise software to change *everything* about how it operates." Gary Hamel, p. 82. However, the "eight major ways" discussed by the author address different problems than the ones Applicants are trying to solve – the "eight major ways" include topics entitled "When Push Comes to Suck", "Just the Plain Truth", "As You Like It", "Everything's an Auction", "The End of Geography", "Search Economies Rule", "My Place, My Time", and "Word of Mouse." Gary Hamel, pp. 82-91. These topics discuss Internet issues from a viewpoint such as consumer needs or distribution economies, issues not addressed by either Knudson or Applicants' invention. In fact, the author states that "Any company that denies consumers convenience and value to protect an entrenched channel is fighting history: Consumers will not be denied." Gary Hamel, p. 92. Gary Hamel does not teach "data

associated with translating progress milestones defined in the projects to tactics defined in the system", "a tactic table operable to store at least one predefined tactic supported by the program office database and a tactic type for each tactic", and "a tactic type to progress milestone category cross-reference table operable to map at least one progress milestone category to the at least one tactic type" as recited by Claim 1, nor is Gary Hamel relied on to teach this limitation. Therefore, Claim 3 is allowable. Thus, Applicants respectfully request that Claim 3 be allowed.

Dependent Claims 9, 13 and 14 stand rejected as being unpatentable over Knudson as applied to Claim 1 above, and further in view of Bates William, *Improving project management: better project management begins with a project management office*. ("Bates William"). Applicants respectfully traverse this rejection and submit that dependent Claims 9, 13 and 14 are allowable as depending from independent Claim 1, shown above to be allowable, and as defining further limitations over the cited references of Knudson and Bates William. Bates William is a three-page article that discusses the concept of establishing a project management office (PMO). The article discusses, for example, in four bulleted points the roles and functions of a PMO that depend on the requirements of a specific organization, along with a number of 'functions' that could be included within each of the major functions. Bates William, p. 1. The article also discusses a "core of project directors or managers who can be assigned to major projects ... and provide coaching and consulting services to other project managers." Bates William, p. 2. Bates William does not teach "data associated with translating progress milestones defined in the projects to tactics defined in the system", "a tactic table operable to store at least one predefined tactic supported by the program office database and a tactic type for each tactic", and "a tactic type to progress milestone category cross-reference table operable to map at least one progress milestone category to the at least one tactic type" as recited by Claim 1, nor is Bates William relied on to teach this limitation. Therefore, Claims 9, 13 and 14 are allowable. Thus, Applicants respectfully request that Claims 9, 13 and 14 be allowed.

Dependent Claims 10 and 15 stand rejected as being unpatentable over Knudson as applied to Claim 1 above, and further in view of *A Guide to the Project Management Body of Knowledge* ("PMBK"). Applicants respectfully traverse this rejection and submit that

dependent Claims 10 and 15 are allowable as depending from independent Claim 1, shown above to be allowable, and as defining further limitations over the cited references of Knudson and PMBK. PMBK discloses that the Project Management Body of Knowledge (PMBOK) is "an inclusive term that describes the sum of knowledge within the profession of project management... and that [the reference] identifies and describes that subset of the PMBOK which is *generally accepted*." PMBK, p. 2. The reference teaches a number of figures that illustrate overviews of various levels of "Project Management." PMBK, pp. 7, 41, 48, 60, 74, 84, 94, 104, 109, 112, and 124. PMBK does not teach "data associated with translating progress milestones defined in the projects to tactics defined in the system", "a tactic table operable to store at least one predefined tactic supported by the program office database and a tactic type for each tactic", and "a tactic type to progress milestone category cross-reference table operable to map at least one progress milestone category to the at least one tactic type" as recited by Claim 1, nor is PMBK relied on to teach this limitation. Therefore, Claims 10 and 15 are allowable. Thus, Applicants respectfully request that Claims 10 and 15 be allowed.

The Examiner rejected Claims 24-26 and 28 as being unpatentable over Knudson et al., U. S. Patent No. 5,765,140 ("Knudson") view of Bates William. Applicants respectfully traverse this rejection and submit that dependent Claims 24-26 and 28 are allowable as depending from independent Claim 1, shown above to be allowable, and as defining further limitations over the cited references of Knudson and Bates William. Bates William does not teach "data associated with translating progress milestones defined in the projects to tactics defined in the system", "a tactic table operable to store at least one predefined tactic supported by the program office database and a tactic type for each tactic", and "a tactic type to progress milestone category cross-reference table operable to map at least one progress milestone category to the at least one tactic type" as recited by Claim 1, nor is Bates William relied on to teach this limitation. Therefore, Claims 24-26 and 28 are allowable. Thus, Applicants respectfully request that Claims 24-26 and 28 be allowed.

The Examiner rejected Claim 29 as being unpatentable over Knudson et al., U. S. Patent No. 5,765,140 ("Knudson") view of Bates William as applied to Claim 28, and further in view of PMBK. Applicants respectfully traverse this rejection and submit that dependent

Claim 29 is allowable as depending from independent Claim 1, shown above to be allowable, and as defining further limitations over the cited references of Knudson, Bates William and PMBK. PMBK does not teach "data associated with translating progress milestones defined in the projects to tactics defined in the system", "a tactic table operable to store at least one predefined tactic supported by the program office database and a tactic type for each tactic", and "a tactic type to progress milestone category cross-reference table operable to map at least one progress milestone category to the at least one tactic type" as recited by Claim 1, nor is PMBK relied on to teach this limitation. Therefore, Claim 29 is allowable. Thus, Applicants respectfully request that Claim 29 be allowed.

The Examiner rejected Claims 33 and 59 as being unpatentable over Knudson et al., U. S. Patent No. 5,765,140 ("Knudson") view of Bates William as applied to Claim 28, and further in view of PMBK. Applicants respectfully traverse this rejection and submit that dependent Claims 33 and 59 is allowable as depending from independent Claim 32, shown above to be allowable, and as defining further limitations over the cited references of Knudson, PMBK and Bates William. As discussed above, none of Knudson, PMBK or Bates William, either alone or in combination, teach or suggest "data associated with translating progress milestones defined in the projects to tactics defined in the system", "storing and accessing a tactic table having at least one predefined tactic supported by the program office database" and "storing and accessing a tactic type table having at least one valid tactic type" as recited by Claim 32, nor are PMBK or Bates William relied on to teach this limitation. Therefore, Claims 33 and 59 is allowable over Knudson, PMBK and Bates William, either alone or in combination. Thus, Applicants respectfully request that Claims 33 and 59 be allowed.

Dependent Claim 58 stands rejected as being unpatentable over Knudson as applied to Claim 33 above, and further in view of Gary Hamel. Applicants respectfully traverse this rejection and submit that dependent Claim 58 is allowable as depending from independent Claim 32 and dependent Claim 33, shown above to be allowable, and as defining further limitations over the cited references of Knudson and Gary Hamel. As discussed above, neither Knudson nor Gary Hamel, either alone or in combination, teach or suggest "data associated with translating progress milestones defined in the projects to tactics defined in the

system", "storing and accessing a tactic table having at least one predefined tactic supported by the program office database" and "storing and accessing a tactic type table having at least one valid tactic type" as recited by Claim 32, nor is Gary Hamel relied on to teach this limitation. Therefore, Claim 58 is allowable over Knudson and Gary Hamel, either alone or in combination. Thus, Applicants respectfully request that Claim 58 be allowed.

In general, dependent Claims 2-16 and 18-31 depend from independent Claim 1, and dependent Claims 33-42 and 44-62 depend from independent Claim 32. Claims 1 and 32 have been shown above to be allowable. Therefore, Claims 2-16, 18-31, 33-42 and 44-62 are patentable as depending from an allowable base claim and as defining further distinctions over the cited art. Thus, Applicants respectfully request allowance of dependent Claims 2-16, 18-31, 33-42 and 44-62.

**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case, the undersigned attorney for Applicants stands willing to conduct such a telephone interview at the convenience of the Examiner.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account 05-0765 of Electronic Data Systems Corporation.

Respectfully submitted,  
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